

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

UNITED STATES OF AMERICA

v.

DAYON BAILEY

JKB-18-506

Denied per
Detention Order
3/20/20

EMERGENCY MOTION FOR DETENTION HEARING

The Defendant, Dayon Bailey, by and through his attorneys, James Wyda, Federal Public Defender for the District of Maryland, and Laura Ginsberg Abelson and Meghan Michael, Assistant Federal Public Defenders, respectfully moves this Honorable Court to schedule a detention hearing and release him on conditions. Mr. Bailey is paraplegic and suffers from many chronic health conditions that make him particularly susceptible to contracting COVID-19 in a jail setting. He therefore asks the Court to release him on conditions for the pendency of his case, or in the alternative until the current pandemic concludes. In support of this motion, counsel states as follows:

I. Procedural posture

Mr. Bailey is charged in four counts of a five-count indictment, with conspiracy to possess with intent to distribute controlled substances, under 21 U.S.C. § 846, possession with intent to distribute controlled substances, under 21 U.S.C. § 841, unlawful possession of a firearm, under 18 U.S.C. § 922(g), and possession of a firearm in furtherance of a drug trafficking crime, under 18 U.S.C. § 924(c).

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
2020 MAR 20 PM 3:25
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FEDERAL PUBLIC DEFENDERS
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